Women of Water

January 28, 2011

Hon. Phil Isenberg, Chair
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

(Via email only to Isenberg, Phil@deltacouncil.ca.gov)

Re: Comment letter to EIR/Delta Water Plan

Dear Chair Isenberg:

We submit this letter as members of Women of Water, a network of women in Southern California with expert leadership experience in water policy and water management. This letter is presented as part of the scoping process for the Delta Plan EIR.

We wish to convey our full support for those principles, objectives, and measures in the Delta Plan which further the goal of helping Southern California achieve independence from State Water Project exports by increasing local conservation, recycled water development, enhanced storm water and urban runoff capture and beneficial reuse, and maximizing groundwater storage.

KEY PRINCIPLES

Among the key principles we support:

- Comprehensive Water Management. Comprehensive management of state and regional water supplies is best achieved through agency cooperation and coordination.

- Area of Origin. The areas that are water rich, the areas of origin in northern California, must be protected so that these areas can grow and maintain their instream flows as required by state law.

- Water Quality. All water quality standards must be clear, publicized, and enforced. Enforcing water quality standards includes maintaining sufficient flows

through rivers, streams and estuaries to ensure ecosystem health as well as public health.

- Ecosystem Restoration. Our rivers, streams and estuaries have become so degraded by water projects and other pollution sources that restoration of instream flows and the ecosystems dependent on these flows must occur. Whenever the place or the purpose of use of diverted water changes, the public trust requires that some portion of the water in question be devoted to the restoration of degraded eco-systems. At least one third of all the water saved by conservation and reuse must be dedicated to fish and stream restorations, and to restoring overdrafted groundwater basins.

- Local Supplies. Local water supplies, which usually are the most dependable, least costly, and most drought resistant resources available to a local community, must be carefully managed and protected for sustainable use by the community.

- Conservation. Conservation is constitutionally mandated and often is the least environmentally damaging way of achieving efficiency in water use. We support increased funding for and further development of conservation programs, particularly in landscape and agricultural irrigation.

- Reuse. Reuse of highly treated wastewater must be encouraged for a wide variety of uses including landscape irrigation and potable reuse. We support funding water reuse and its attendant infrastructure as a priority over increased funding for desalination and/or surface storage.

- Watershed Management. Watershed management plans shall be developed to maximize coordination of all government agencies and the public to achieve multiple benefits, including but not limited to capturing stormwater, recharging aquifers, improving water quality, reducing flood hazards and restoring wildlife habitat. The beneficiaries of exported water should be required to invest in watershed restoration.

- Groundwater Management. The groundwater and surface water within a basin or watershed are typically physically connected, and must be managed using whole system management approaches. In order to protect instream flows and terrestrial habitat, controls on overdraft should be instituted immediately. Ultimately, means should be found to reduce or eliminate groundwater overdraft.

RECOMMENDATIONS

Specific to the Delta Plan, we offer these comments:

1. We support the independent science board and recommend inclusion of academic disciplines in ecosystem restoration, emerging water management technologies, and economics.

2. We support the direction of developing a water budget approach for evaluating reasonable use for all sectors.

3. We urge a commitment at all levels of government that a sufficient proportion of any available funding will be allocated for the development of local supplies, and the proportionality should be tied to: (a) the immediacy of return on investment, both in terms of development of supply and job creation; and (b) level of catastrophic or infrastructure risk avoidance (including but not limited to delta collapse due to flooding or sea level rise and water quality impacts).

A SOUTHERN CALIFORNIA VISION

Enclosed please find a document which we prepared in 2007 which contains specific recommendations to support that last point, and which are in keeping with the principles above, called "A Southern California Vision: Water Supply Development through Local Projects/Suggestions for State Bond Funding."

Thanks to the research of Michael Gagan of Kindel Gagan, we have updated information to present. Several developments have rendered overly modest what we thought at the time were ambitious conservation and local water supply goals. The white paper identified 736,000 acre-feet of additional supply that could result from local conservation and development projects and programs. In the past three years, however, Southern California has outperformed many expectations in the development of local supply by the initiation and implementation of projects and ordinances that achieve those goals.

Conservation

We set the regional goal for additional water conservation by 2025 at 309,000 acre-feet (150,000 acre-feet more than the Metropolitan Water District's goal for 2025 of an additional 159,000 acre-feet). By virtue of drought measures implemented throughout the region in the past three years, we have already exceeded that goal. Moreover, the

State's 20x2020 Plan, adopted since the Vision paper was prepared, mandates a reduction at the retail level in MWD's service area of 380,000 acre-feet by 2025.

Recycled Water

In 2007 we thought an additional 100,000 acre-feet of recycled water would be a plausible component of a total new local supply portfolio of 736,000 acre-feet by 2025. That number has been exceeded in just three years by new projects coming on line and expansions of existing projects. The Groundwater Replenishment System of the Orange County Water District, the world's largest wastewater purification system for indirect potable reuse, is capable of producing 78,000 acre-feet per year, and plans are underway for its expansion. Agencies in San Diego County have added 32,000 acre-feet of recycled water to their supply portfolio. Irvine Ranch Water District has increased its recycled water production by nearly 30,000 acre-feet. Inland Empire Utilities Agency has added 29,000 acre-feet since 2007-08.

The Groundwater Reliability Improvement Program (GRIP) referenced in the Delta Stewardship Council's White Paper on Water Resources has a planned total capacity of 50,000 acre-feet. The West Basin Municipal Water District and the City of Los Angeles recently concluded an agreement that will result in 9,000 acre-feet of recycled water to serve refineries. The Metropolitan Water District and the Los Angeles County Sanitation Agencies are studying the feasibility of recycling up to 450,000 acre-feet of treated effluent currently disposed to the ocean. There are many other recycled water projects in the conceptual, planning, feasibility or implementation stage throughout Southern California, including that of the City of Los Angeles departments of Water and Power and Public Works, to develop an additional 50,000 acre-feet.

Groundwater Desalination

Our 2007 paper referenced 250,000 acre-feet of brackish water in the Los Angeles Coastal Plain as a water supply opportunity. Recent studies indicate that the plume actually consists of 650,000 acre-feet.

The Capture of Additional Stormwater

We earlier saw the potential for the reduction and reuse of 270,000 acre-feet of wet weather runoff through diversion, treatment and infiltration. There is an annual average of more than 1 million acre-feet of stormwater runoff generated from urban areas in the valley floors alone within the service area of the Metropolitan Water District. There are known projects and programs that could increase storm water capture and reuse by as much as 56,000 acre-feet per year. We think the potential of 270,000 acre-feet

remains plausible, however, given the heightened attention to capture and reuse resulting from the 10-year *Water Augmentation Study* led by the Los Angeles & San Gabriel Rivers Watershed Council, the regional effort led by the Los Angeles County Department of Public Works to make spreading grounds more efficient, and the relatively recent adoption of low impact development ordinances by municipalities throughout Southern California.

CONCLUSION

A remarkable transformation in how Southern California looks at water supply is underway. The cumulative impact of accelerated local supply development and conservation in just the past few years means we need to reexamine long-held assumptions about the volume of imported water required to meet the long-term needs of Southern California.

Thank you for the opportunity to provide these comments.

Respectfully submitted[1],

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Shelly Luce, Executive Officer, Santa Monica Bay Restoration Commission
Lynne Plambeck, President, Santa Clarita Organization for Planning and the Environment
Nancy Steele, Executive Director, Los Angeles and San Gabriel Rivers Watershed Council

[1] There are members of Women of Water who have participated in the review of this letter and its attachments, but are not signatories due to the exigencies of time and the requirements of position. Those who have signed are providing titles for identification purposes only, but that information is not intended to and does not necessarily convey the views of the organizations of which we are a part.